

Department of Behavioral Health
TRANSMITTAL LETTER

SUBJECT Escrow Account in Environmental Stability Housing Service		
POLICY NUMBER DBH Policy 532.2	DATE JUL 28 2015	TL# 286

Purpose. To establish guidelines for escrow accounts of the environmental stability (ES) housing service.

Applicability. Department of Behavioral Health (DBH)-certified recovery support service providers participating in the environmental stability (ES) housing service.


Policy Clearance. Reviewed by affected responsible staff and cleared through appropriate Behavioral Health Authority (BHA) offices.

Effective Date. This policy is effective immediately.

Superseded Policy. None.

Distribution. This policy will be posted on the DBH web site at www.dbh.dc.gov under Policies and Rules. Applicable entities are required to ensure that affected staff is familiar with the contents of this policy.


Barbara J. Bazron, Ph. D.
Interim Director, DBH

GOVERNMENT OF THE DISTRICT OF COLUMBIA  DEPARTMENT OF BEHAVIORAL HEALTH	Policy No. 532.2	Date JUL 29 2015	Page 1
	Supersedes: None		

Subject: Escrow Account in Environmental Stability Housing Service

1. **Purpose.** To establish guidelines for escrow accounts of the environmental stability (ES) housing service.

2. **Applicability.** Department of Behavioral Health (DBH)-certified recovery support service providers participating in the environmental stability (ES) housing service.

3. **Authority.** DBH Establishment Act of 2013 and 22 DCMR Chapter A63, Certification Standards for Substance Use Disorder Treatment and Recovery Providers.

4. **Definitions.**

4a. **Environmental Stability (ES) Housing Service.** A DBH Department program that offers up to 6 months of transitional housing to clients who qualify to participate. Clients are provided with financial management education, care coordination services, conflict resolution skills, and relapse prevention strategies. An escrow account is required for clients participating in this program. To qualify for participation, client shall:

- Be drug and alcohol free (with the exception of prescribed medication) for 30 days prior to admission;
- Maintain sobriety throughout the program; be in recovery from a diagnosed SUD;
- Be employed or in a training program, or participating in both work and training, for a minimum of 30 hours a week or specifically excepted for medical reasons by the Director;
- Deposit 50% of net income into provider's client escrow account for the purposes of post environmental-stability independent living;
- Be enrolled and active in other Department-certified recovery support services; and must be prior authorized by the Department.

4b. **Escrow account.** An account established by a third party for holding funds on behalf of the client until completion of treatment or agreement.

4c. **Fiscal agent.** The person who conducts transactions for an escrow account.

5. **Policy.** DBH ES providers shall follow the guidelines for the establishment of an escrow account at a federally insured financial institution for monthly income and/or savings to be deposited by each individual client or his/her representative payee. The funds are provided to the client when he/she is discharged from the program for use in establishing his/her own household.

6. **Guidelines for the Escrow Account.**

6a. The ES provider shall:

- (1) Deposit no less than fifty percent (50%) of the client's monthly income into an established escrow account at a federally insured financial institution during his or her enrollment in the ES.
- (2) Ensure that the escrow account is a non-fee account.
- (3) Designate a fiscal agent to maintain the client escrow account.
- (4) Designate a monitoring unit or agent (e.g., Recovery Manager, Certified Recovery Specialist and/or Qualified Practitioner) for the escrow account;
- (5) Maintain client escrow funds separate and apart from any other personal, business or operating accounts.
- (6) Ensure that only the client's funds are deposited into a client's escrow account.
- (7) Present clients with a receipt of deposit for each transaction.
- (8) Deposit all client escrow funds received into the client escrow account no later than the next business day following receipt of the funds.
- (9) Provide each client with a statement detailing the amount of funds the client has deposited within the client escrow account monthly and at the request of the client.
- (10) Not withdraw a client's funds from the client escrow account during his or her tenure in the program.
- (11) Ensure that there is an client beneficiary and emergency contact to receive the funds in case of sudden death or illness of a client.
- (12) Only disperse funds from the escrow account to a client when he/she is discharged from the ES.
- (13) Assist the client, upon his/her request, in setting up a personal checking, savings or any other type of banking or money market account to hold funds dispersed to the client from the client escrow account. Such accounts shall not be established by, or in the name of, the provider or any agents of the provider.
- (14) Keep an account record of the funds within the escrow account. The account record shall include:
 - a. Client identification;
 - b. Escrow account identification;

- c. Date funds received by the provider;
- d. Amount of funds received by the provider;
- e. Date funds were deposited into the client escrow account;
- f. Amount of funds deposited into client escrow account;
- g. Date funds were withdrawn and dispersed to client; and
- h. Amount of funds withdrawn and dispersed to client.

(15) Provide the client with a receipt detailing the amount dispersed to the client, upon dispersal of funds within the client escrow account record.

(16) Furnish to authorized agents from DBH, upon presentation of proper identification, account records or any other information related to client escrow accounts.

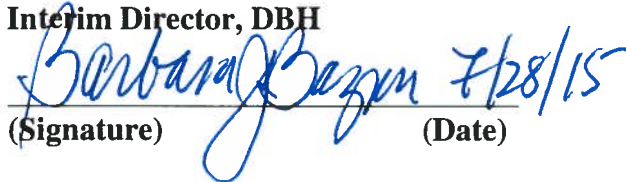
(17) Following the discharge of a client, the sum of the money deposited by the client into the established escrow account and any accrued interest shall be withdrawn and dispersed by the provider to the client within twenty four (24) hours, not including holiday and weekends, of the client's discharge. ES account record shall be maintained by the provider for a minimum of 3 – 5 years, after client has been discharged.

7. **Compliance**. DBH ES providers shall establish internal policies and procedures regarding clients' escrow accounts.

8. **Accountability**. The DBH Office of Accountability shall monitor compliance of this policy.

Approved by:

Barbara J. Bazron, Ph. D.
Interim Director, DBH


(Signature) (Date)